
UNITED STATES BANKRUPTCY COURT
Western District of Wisconsin

In re:

LAURITSEN FIREWOOD & RENTAL, INC.,
Debtor

Case no. 17-11785

MOTION TO SELL ASSETS OUTSIDE NORMAL COURSE

Debtor, by Attorney Joshua D. Christianson of Christianson & Freund, LLC, respectfully represents:

1. On May 17, 2017, Debtor filed for relief under Chapter 11 of the Bankruptcy Code.
2. Among the assets of the Debtors' estate is one Vermeer Grinder, VIN 1VR2503839100108 (hereinafter the "Grinder").
3. The Debtor scheduled the Grinder as having a value of \$350,000.
4. The Grinder secures a debt to Agstar n/k/a Compeer Financial in the amount of \$509,268.15 as of May 7, 2018, who holds the first-position security interest in the Grinder. See Amended Proof of Claim 10-2 Part 14.
5. The Grinder acts as security for all indebtedness to Compeer. Amended Proof of Claim 10-2 Part 14, Page 3, Paragraph 9.(1).
6. The Debtor listed the Grinder for sale with the permission of Compeer.
7. The Debtor has arranged for the sale of the Grinder, upon court approval, for a sale price of \$340,000, to be paid directly to Compeer.
8. The Debtor has arranged this sale through its own efforts, and no sales commission or other costs are expected to be deducted from the sale price.
9. Upon information and belief, Compeer consents to this sale of the Grinder and the application of the payment to its debt.

10. The offer to purchase is an arms-length transaction, obtained by regular commercial sales practices.

11. Debtors believe this sale to be the best price that can be obtained, and this sale to be commercially reasonable and in the best interest of debtors and their creditors.

12. The sale will be free and clear of all liens, claims and encumbrances, with the same to attach to the proceeds of sale in order of their priority.

13. Specifically, the sale price will be wired directly from the buyer to Compeer.

WHEREFORE, the Debtors respectfully request that this Court enter an Order authorizing the Debtors to sell real estate, free and clear of all liens, claims and encumbrances, with the same to attach to the proceeds of the sale in the order of their priority, and that the Court grant such other and further relief as is appropriate.

Dated October 14, 2018.

CHRISTIANSON & FREUND, LLC
Counsel for Debtors

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By: ___/s/_____
Attorney Joshua D. Christianson